

**From:** [ntschuck@juno.com](mailto:ntschuck@juno.com)  
**To:** [E-OHPSCA2713.EBSA](mailto:E-OHPSCA2713.EBSA)  
**Subject:** Comment: RIN 1210-AB44  
**Date:** Tuesday, September 27, 2011 8:21:18 PM

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To Whom It May Concern:

I am writing today to ask in the strongest way possible (without resorting to expletives) that you rescind the unjust and coercive mandate that all "contraceptives" and sterilization procedures be covered by private health insurance with no co-pay to patients. If you do not reverse course I ask you to at least expand conscience protections for any organizations that provide individual and group insurance and have moral or religious objections. I strongly oppose the government forcing free insurance coverage on Americans especially for drugs (RU486) and devices that I oppose because some of these can cause an abortion (such as ella and Plan B).

As a rule making arm of the federal government, it is your duty to perform what Congress is too weak kneed and irresponsible to do themselves. As you cannot be elected or fired by the Public, you have to take my comment as seriously as any other person or donator to the establishment parties. My guess is that the IOM committee recommendations intentionally and conveniently left out the right of conscientious objection to forced violation of God's laws in addition to the dubious constitutionality of Obamacare. I would also guess that comments requesting elimination of this interim rule or at least a reasonable accomodation for religious objection are running ten to one.

There are plenty of for profit businesses owned by persons of conscience that do not want to offer healthcare services requiring coverage of things they consider immoral. They don't have to primarily cater to persons of the same thought. They are in almost all ways just like their secular counterparts. They just happen to have firm beliefs. Why does the definition of 'religious employer' have to be so narrow??

I ask you to reconsider your definition of religious employer and offer an authentic conscience protection for ANY organization and business that has moral or religious objection to providing such insurance to their employees. This legal mandate clearly violates the spirit of conscience laws which prohibit government discrimination against those who object to various health services on moral or religious grounds. The definition of "religious employer" in the regulation is so narrow as to only include churches, but will still mean that a host of businesses and organizations that have conscience objections will be required to choose between either violating their conscience or not being able to offer employees health insurance.

I suggest you add the word 'any into the wording as follows and add (5):

(B) For purposes of this subsection, a "religious employer" is an organization that meets ANY of the following:

- (1) The inculcation of religious values is the purpose of the organization.
- (2) The organization primarily employs persons who share the religious tenets of the organization.
- (3) The organization serves primarily persons who share the religious tenets of the organization.
- (4) The organization is a nonprofit organization as described in section 6033(a)(1) and section 6033(a)(3)(A)(i) or (iii) of the Internal Revenue Code of 1986, as amended.

You should also add (5) The business or organization owned or operated by a person with religious objections to offering contraceptive and abortion services, including group insurance businesses

Please protect the conscience rights of insurers, providers and people like me who object to being forced by the federal government to offer or subsidize contraceptives and sterilization services, especially when some of these drugs can take the life of early unborn children. NO Americans should be forced by

the federal government to essentially subsidize services they object to. I again urge you in the strongest way possible to reverse course and remove contraceptives and sterilizations from the list of mandatory preventive services.

Sincerely,  
Nathan Schuck  
Mason, MI 48854